

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                |   |                       |
|--------------------------------|---|-----------------------|
| <b>HOFFMAN &amp; KOZLANSKY</b> | : |                       |
| <b>REALTY CO., LLC,</b>        | : |                       |
|                                | : |                       |
| <b>Complainant,</b>            | : |                       |
|                                | : |                       |
| <b>v.</b>                      | : |                       |
|                                | : |                       |
| <b>PENNSYLVANIA AMERICAN</b>   | : |                       |
| <b>WATER COMPANY</b>           | : |                       |
|                                | : |                       |
| <b>Respondent.</b>             | : | <b>C-2018-3006168</b> |

**MOTION FOR CONTINUANCE, EXTENSION FOR EXPERT REPORT  
AND SECOND PREHEARING CONFERENCE**

AND NOW, Complainant Hoffman & Kozlansky Realty Co., LLC (“Complainant”), by and through their undersigned counsel, and respectfully files this Motion for Continuance of the hearing scheduled for April 29, 2019, an extension to file expert reports, and requests to convert the hearing scheduled for April 29, 2019 into a telephonic prehearing conference, in accordance with section 1.15(b) of the Pennsylvania Utility Commission Regulations, 52 Pa. Code § 1.15(b). In support thereof, Complainant states as follows:

1. Elliott Greenleaf, P.C. has recently been retained to represent Complainant in this matter and have entered their appearance on April 15, 2019.
2. On or about March 6, 2019, Complainant filed a Formal Complaint (“Complaint”) against the Pennsylvania Water Company alleging various violations of the Pennsylvania Utility Code.
3. A hearing is currently scheduled for this matter on Monday, April 29, 2019 in Harrisburg, Pennsylvania before the Honorable Administrative Law Judge Steven Haas.

4. Complainant served discovery requests on Respondent Pennsylvania American Water Company (“Respondent”) on or about March 27, 2019.

5. On April 8, 2019, Respondent filed objections to certain discovery requests of Complainant.

6. Respondent’s discovery responses to the discovery are due on or around April 26, 2019.

7. Complainant’s expert report is currently due on or before April 22, 2019.

8. Complainant’s expert will need Respondent’s discovery responses prior to completing his expert report.

9. Because Elliott Greenleaf, P.C. has just been retained, Complainant respectfully requests a brief continuance of the hearing scheduled for April 29, 2019, and the deadline to file expert reports.

10. The parties request that the April 29, 2019 hearing date be converted into a second prehearing telephonic conference so that a final hearing date can be established and the parties can address deadlines and any other evidentiary and discovery issues at that time.

11. Counsel for Respondent consents to this motion.

**WHEREFORE**, Complainant respectfully requests that the expert deadline and hearing scheduled for April 29, 2019 be continued for thirty days.

Respectfully submitted,

s/John G. Dean  
John G. Dean  
Shanna W. Williamson  
Matthew G. Boyd  
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Attorneys for Complainant Hoffman  
& Kozlansky Realty Co., LLC

Dated: April 15, 2019

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| <b>WATER COMPANY</b>           | : |                       |
|                                | : |                       |
| <b>Respondent.</b>             | : | <b>C-2018-3006168</b> |

**CERTIFICATE OF SERVICE**

I, JOHN G. DEAN, hereby certify that I have caused to be served this day a true and correct copy of a Motion for Continuance on all parties of record via email and first class mail in accordance with the requirements of 52 Pa. Code § 1.54, upon the following:

Margaret A. Morris, Esq.  
REGER RIZZO & DARNALL  
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Attorney for Respondent

s/John G. Dean  
John G. Dean

DATED: April 15, 2019